

**FEDERAL PUBLIC DEFENDER**

**DISTRICT OF NEW JERSEY**

**RICHARD COUGHLIN**  
FEDERAL PUBLIC DEFENDER

800-840 Cooper Street  
Suite 350  
Camden, New Jersey 08102

**CHESTER M. KELLER**  
FIRST ASSISTANT

(856) 757-5341 Telephone  
(856) 757-5273 Facsimile

January 7, 2021

The Honorable Karen M. Williams  
United States Magistrate Court Judge  
United States District Court – District of New Jersey  
Mitchell H. Cohen Federal Courthouse  
One John F. Gerry Plaza  
Fourth and Cooper Streets  
Camden, NJ 08101

**RE: United States v. Richard Tobin**  
**Criminal No. 19-5644(KMW)**  
**Proposed Consent Order to Modify Conditions**  
**of Release**

Dear Judge Williams:

After consultation with U.S. Pretrial Services, I am requesting that Richard Tobin's bail conditions be modified to place him on a curfew from 7:00pm to 7:00am. Furthermore, I am requesting that Mr. Tobin be permitted to leave his home outside of the curfew limits with preapproval by U.S. Pretrial Services.

Mr. Tobin is continuing to engage in mental health treatment and is on a house arrest with electronic monitor. Mr. Tobin has been on pretrial release since April 15, 2020 and has been in full compliance of his conditions of release. Assistant U.S. Attorney Kristen Harberg has no objection to this request. A proposed Order is attached.

Respectfully submitted.

*s/ Lisa Evans Lewis*  
LISA EVANS LEWIS  
Assistant Federal Public Defender

cc: Kristen Harberg, Assistant United States Attorney  
Gary Pettiford, Supervisory U.S. Pretrial Services Officer